

RE: CALVIN CAMPS, PRO. SE. MQ1920
S.C.I. CHESTER
500 EAST 4th STREET
CHESTER PA 19013

RECEIVED

JUN - 7 2018

AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

IN THE UNITED STATES DISTRICT COURT FOR NEW JERSEY

CALVIN CAMPS, Civil Action No. 1:17-cv-01895
Plaintiff(s) (JBS-JS)

JURY TRIAL DEMAND

Vs.

WARDEN MILLIE SCHOLTZ, et.al.
CAPTAIN, MCDONNELLY,
SARGEANT, MS. DAVIS,
ALL BOARD OF CHOSEN FREEHOLDERS OF BURLINGTON COUNTY,
MUNICIPAL, CORP,
Defendants

PLAINTIFF'S THIRD-PARTY COMPLAINT TO JOIN DEFENDANTS

Plaintiff, CALVIN CAMPS, (hereinafter "Plaintiff"), Brings
This suite to recover for federal constitutional violations
And state law claims, as follows:

JURISDICTION AND VENUE

1. Jurisdiction in this Court is asserted under the provisions
of 28 U.S.C. §1331 and §1343.

This action arises under the provision of 42 U.S.C. §1983.

2. Venue is appropriately laid in this Court pursuant to 28
U.S.C. §1391(b) in that the actions complained of took place
within the bounds of Burlington County New Jersey.

(2)

SUPPLEMENTAL JURISDICTION

Under Article III of the United States Constitution.

Such Supplemental Jurisdiction, Shall include Claims that
INVOLVE the Joinder or Intervention of additional Parties.

Title 28 U.S.C.S. § 1332

Over Claims by Plaintiff's against Persons made Parties,
Under RULE 14, 19, 20 or 24 of the Federal Rules of Civil Procedure.
re.

(3)

PARTIES

3. Plaintiff, Calvin Camps, is a 62-year-old detainee at the Pennsylvania Department of Corrections Institution of Chester, 500 East 4th STREET, CHESTER PA 19013.

4. Plaintiff was at all times relevant to this Cause of Action A Pre-Trial detainee at the Burlington County Jail at 54 Grant STREET, MOUNT HOLLY, New Jersey 08060-9998.

5. Defendant, Warden Millie Scholtz, is the Warden of Burlington County Detention Center, She is responsible for the overall OPERATIONS of the County jail, She is responsible for the daily Operations overseeing all Employees, Who work inside the Burlington County Jail at the Address of 54 Grant Street, Mount Holly, NEW Jersey 08060-9998

6. Defendant, Captain MCDONNELLY, is an Officer, Who is responsible for daily operations overseeing all Employees, Who work inside The Burlington County Jail at the Address of 54 Grant Street, MOUNT Holly, New Jersey 08060-9998

7. Defendant, Sergeant, MS. DAVIS, is an Officer, Who is responsible for daily operations overseeing all Employees, Who work Inside the Burlington County Jail at the Address of 54 Grant Street, MOUNT Holly, New Jersey 08060-9998

8. ALL BOARD OF CHOSEN FREEHOLDERS OF BURLINGTON COUNTY, are RESPONSIBLE for all POLICIES that Prison Officials carry out Within the County Mount holly New Jersey, 49 Rancocas Road MOUNT

(4)

PARTIES

8. HOLLY, New Jersey 08060

9. CFG HEALTH SYSTEMS, LLC, Is Contractor for Medical Services For Inmates being housed inside the Burlington County Jail for PROFIT, Who are Responsible for daily services to Inmates 24 HOURS a day, Under State and Federal laws, to see the Operation And Overseeing of its Medical Personal, Who work inside the BURLINGTON County Jail at the Address of 54 Grant Street, MOUNT HOLLY, New Jersey 08060-9998

10. Defendant, Doctor Jane Doe, is an Employee for Contractor Of Medical Services, CFG Health Systems, LLC. Who has an office Inside the Burlington County Detention Center, Who has a duty As an Doctor to treat Inmates under Standard of Care for daily SERVICES overall responsible in operations overseeing appointments' Orders for Nurses. She is being sued in her official and Individual capacity for acts and omissions under the Color of Laws. Who work inside the Burlington County Jail at the Address Of Grant Street, Mount Holly, New Jersey 08060-9998

11. Defendant, Nurse Christina Owens, is an Employee for Contractor CFG Health Systems, LLC., Who had a duty to treat Inmates Under Standard of Care and follow the laws. She is being sued In her official and individual capacity for acts and omissions Under the Color of Laws. Who work inside the Burlington County Jail at the Address of Grant Street, Mount Holly, New Jersey 08060-9998

(5)

12. Defendant, Nurse JOHNSON, is an Employee for Contractor CFG Health Systems, LLC., who had a duty to treat inmates under standard of care and follow the laws. She is being sued in her official and individual capacity for acts and omissions under the color of laws. who work inside the Burlington County Jail at the address of Grant Street, Mount Holly, New Jersey 08060-9998

13. Defendant, Nurse Murphy, is an Employee for Contractor CFG Health Systems, LLC., who had a duty to treat inmates under standard of care and follow the laws. She is being sued in her official and individual capacity for acts and omissions under the color of laws. who work inside the Burlington County Jail at the address of Grant Street, Mount Holly, New Jersey 08060-9998

14. Defendant, Health Services Administrator, Stacy Chase, is the Medical Director of CFG Health Systems, LLC., at Burlington County Jail. She is responsible for overall operation of the Medical Department and its said employees at Burlington County Jail. She is responsible for daily operations in the medical regards to overseeing the outside appointments, work schedules for nurses and doctors/providers, assignment them to various DUTIES. She has the obligation and responsibility to hire and FIRE anyone employed for CFG Health Systems, LLC., at the BURLINGTON County Jail is the final POLICY maker for provision is being sued in her official and individual capacity for acts and omissions under the color of law. At Grant Street, Mount

(6)

Who work inside the Burlington County Jail at the Address of
GANT Street, Mount Holly, New Jersey 08060-9998

This matter was filed before this Honorable Court and its Judges As to the Violations of the Plaintiff Calvin Camps Rights being DENIED by Agents, Employees, Officers, Officials, Servants and Its Contractor CFG HEALTH SYSTEMS, LLC. and its Employees, Who CAUSED said Violations to his Constitutional Rights, Causing Him to be subjected to Punishments and Denials as to the Unconstitutional Conditions of confinement at the Burlington County Jail.

The Plaintiff Calvin Camps, was granted in forma pauperis Status by the state court. On or about March 7, 2017, Were the PLAINTIFF Calvin Camps default judgment was vacated by the Court Against Defendants. Here the Defendants Attorney of record moved Said Cause of Action to this Court. The Plaintiff has given FAIR Notice of all said CLAIMS as to his being caused Punishments As to those said Conditions that were Caused by their Policies Which caused those Unconstitutional Conditions, under STAFFED LOCK Downs, Overcrowded Conditions and the DENIAL to Requested MEDICATIONS for his LIVER Condition he is suffering from Hepatitis C genotype 1b.

Herein the Plaintiff is seeking REDRESS for those said ILLEGAL CONDITIONS and Deprivation of his RIGHTS, PRIVILEGES, And/Or IMMUNITIES Secured by the Federal Constitution, He is alleging Those said Defendants have Violated his Due Process Clause of The FOURTEENTH Amendment Rights by those, Who acted under Color Of laws, Under an Established POLICIES or PROCEDURE, The ITEMS FELL within the definition of PROPERTY, The Plaintiff, Calvin

CAMPS, Stated that his State and Federal Rights were VIOLATED, By Agents; Employees; Officers; Officials, and Medical Personal And its Provider CFG HEALTH SYSTEMS,LLC., as to DENIALS, INJURY, PUNISHMENTS and Violations under State and Federal laws.

Here the Prison Officials did not inform him about his Rights, Under State law. He was never given any Hearing in Violation Of Due Process, NOTICE, or any Opportunity before being Deprived BY all defendants of Material Items taken by Employees.

Herein the Defendants refused to send out LEGAL MAIL, On his PENDING Legal cases filed in the Court of Common Pleas Civil TRIAL Division, More than One he gave Prison Officials has out (TIME), Going mail to be sent to the Parties of record, It was RETURNED Postage needed, Money he was Arrested with was taken By Prison officials without giving any kind of NOTICE to the PLAINTIFF Calvin Camps, He has SUFFERED Injury to his filed LEGAL Cases were he followed those Policies by Defendants inside BURLINGTON County Jail, He filed a number of Complaints also And filed his FINAL EXHAUSTION and APPEALS to Warden Mildred SCHOLTZ, NOTICE of CLAIMS,. On the night of December 15,2014 The Plaintiff Calvin Camps, was asked a number of questions By Prison Guards and Nurses he was seen by the following Nurses Nurse Murphy, Nurse Johnson, Nurse Jones, were he told them About his ongoing medical condition, and that he was being TREATED at the Philadelphia Veterans Hospital 3900 Woodland Avenue, Philadelphia Pa 19104. He Requested that they call The Veterans hospital, This was not done by any of those Nurses

Or did they call the Veterans hospital as to my being Treated
By those Doctors as to ongoing Medical care.

At all times each said Defendant had Personal Involvement, as
To his being subjected to those Unlawful Conditions, All said
Defendants are RESPONSIBLE for the DENIALS to Requested MEDICATIO
N for his Health ISSUES, While the Plaintiff was being housed
Inside the Burlington County Jail. The Plaintiff Calvin Camps
Was made to SUFFER by those said PUNISHMENTS to his SERIOUS,
LIVER Condition, Were the NURSES, On duty did not write his
COMPLAINT, In the Medical records, were Calvin Camps told all
Named Defendants that he was Suffering from a number of Medical
CONDITIONS and he was in need of Medical Treatment and MEDICATION
s, Which was not ORDERED or PROVIDED by Nurses, Ownes, Johnson,
Murphy, or Doctor Jane Doe or Administrator Stacy Chase, or
CFG HEALTH SYSTEMS, LLC., Thereby causing the Plaintiff Calvin
CAMPS, further Injury, Pain and Suffering, Harms, PUNISHMENTS,
Along with all other Prison Officials named herein this said
COMPLAINT. Those said Defendants did not Order any Tests or
Did they check to see what MEDICATIONS he was on, Once he made
Those said Requests to Prison Employees. He filed a number of
COMPLAINTS, with the Burlington County Prison Officials as to
All Unconstitutional Conditions, He was being caused as an PRE-
TRIAL DETAINEE, All Inmates were being subjected to those said
ILLEGAL Conditions as to the Plaintiff Calvin Camps, #107480,
All Party Defendants had Personal Knowledge of those facts of

Said CONDITIONS and had Personal Involvement and had Responsibilities and Duties not to VIOLATE the State and Federal Constitutional RIGHTS of anyother CITIZEN, Such as the Plaintiff Calvin CAMPS, who was being held inside the Burlington County Jail, Waiting for TRIAL, at all times each Defendants Caused said PUNISHMENTS, DENIALS, all said ACTS took place inside the County Of Burlington New Jersey. Here those Defendants Burlington County BOARD of CHOSEN FREEHOLDERS MEMBERS and Warden Millie Scholtz, SET UP POLICIES and CUSTOMS, That caused those said UNCONSTITUTIONAL VIOLATIONS, to all Inmates being housed inside the Burlington COUNTY Detention Center, where Inmates did file a number of Complaints are filed on Prison records from a number of other INMATES CONVICTED and Pre-Trial Detainees, Such as the Plaintiff, CALVIN Camps, Herein this said Complaint, the Plaintiff is DUE RELIEF, for those UNCONSTITUTIONAL ACTS and CONDITIONS. He has Stated a Cause of Action, in which Relief, Should be GIVEN to REDRESS all said CLAIMS and VIOLATIONS, under POLICIES And Customs, He has filed Documents that SHOW facts as to said ILLEGAL ACTS and Conditions as to Injury, Punishments and Violations to State and Federal laws by those Defendants acting under COLOR of laws, There are a number of other INMATE Witnesses who were Caused those said same Constitutional DENIALS by Employees, Inside the Burlington County Jail. Each said Defendant ACTED Inconcert with each other and were acting under ORDERS Or Policies put in to place by Board of Chosen Freeholders

And the Prison Officials at Burlington County Detention Center, That Caused said Violations to the Plaintiff Calvin Camps along With all other inmates being housed within the Burlington County JAIL.

The DENIALS to Requested Medications for LIVER CONDITION, By Defendant, Nurse Owens, Nurse Johnson, Nurse Murphy, Doctor Jane Doe, Caused a Direct Denial to Proper Medical Care:

- (a) Failure to exercise the requisite degree of care and skill;
 - (b) Failure to follow Doctor's orders as to said treatments To Plaintiff, Calvin Camps,
 - (c) Failure to Perform necessary MEDICAL testing, and treatment Which was Requested by Calvin Camps, were complaints are filed On County Prison records and with officials as to the Direct CAUSE of all said HARMS, INJURIES, PUNISHMENTS, or DENIALS, AGGRAVATION to his Pre-Existing Medical condition, Which is On record that the Plaintiff was and is under medical treatment, By other Doctors'.
 - (d) Failure to exercise reasonable care in diagnosis and treatment of Calvin Camps's CONDITION for which prompt, diagnosis and Here and is CRITICAL for Proper Medical Treatment;
 - (e) Failure to recognize and treat, PLAINTIFF'S, Condition in The fact of obvious Clinical signs and symptoms;
 - (f) Being otherwise Negligent, Careless and Reckless, Willful As may be demonstrated at TRIAL, or determined through discovery;
- And

(g) Failure as a matter of law as to serious Medical Conditions:

Doctor Jane Doe, Caused direct denials to Proper medical care, By not acting under Requests made by the Plaintiff, Calvin CAMPS, for Medication for his Ongoing LIVER Condition, he was SUFFERING from before he was Arrested and taken to the Burlington County Detention Center, he told the Defendants herein Named NURSES about his Ongoing Condition, She was in charge of those NURSES, OWENS, JOHNSON, MURPHY, By Agents, Employees, Servants, Who failed to follow Doctors Orders, consisted, inter Alia Of the following;

(a) Plaintiff, Calvin Camps, incorporates by Reference the ACTS of Failure as stated in the previous paragraphs;

(b) Failure to exercise or to have Reasonable, diligent and Properly trained personnel on DUTY, to treat the Plaintiff, CALVIN CAMPS, Were he Requested said Proper care for his ongoing MEDICAL condition, Once he Requested Medications from those MANED Defendants, who are Employees for CPG Health Systems, LLC.,

(d) Failure to see that all Nurses diagnose and Respond in A timely manner once the Correctional officer, sent him to The Medical department for his Complaints,

(e) DENIAL TO TREATMENT AS A MATTER OF LAW, and

(f) Failure to properly Supervise, those who are under Doctor, PA-C, Nurse, Its Agents, Servants, or Employees in the diagnosis And Treatment of Plaintiff, Calvin Camps, Defendant, Doctor JANE Doe, is Responsible for the Negligent Acts and Omissions Of those Agents, Employees, Servants, Defendants, Nurses Owens,

Nurse Johnson, Nurse Murphy, are Employees for CFS Health Systems LLC.,

WHEREFORE, Calvin Camps, Brings this Cause of Action, against All Defendants to recover Civil Damages in amount of \$ 5,000.000 Six Million Dollars

The Negligence of Defendant, CFS HEALTH SYSTEMS, LLC., Its officers, Doctors, Nurses, PA-C, Agents, Employees or Servants, consisted, inter Alia of the following;

- (a) Plaintiff, Calvin Camps, incorporates by Reference the Acts of DELIBERATE INDIFFERENCE, as stated in all previous paragraphs;
- (b) Failure to exercise Reasonable care, under the circumstances;
- (c) Failure to act Reasonable, diligent and properly trained Personnel, who failed to file Complaints on Prison records by The Plaintiff, Calvin Camps, On the date of December 15, 2014, On duty to follow the New Jersey laws and treat all Citizens, Properly such as the Plaintiff, Calvin Camps,
- (d) Failure to diagnose and Respond in a timely manner, Where Said Plaintiff, Requested Medical Care to Employees inside the BURLINGTON County Detention Center for CFS HEALTH SYSTEMS, LLC.,
- (e) DELIBERATE INDIFFERENCE AS A MATTER OF LAWS; and
- (f) Failure to properly Supervise its Agent, Employees, or Servants, Nurses or PA-C in diagnosis and care, treatment in which The Plaintiff made COMPLAINTS, On issues to Employees, who Refused and Denied his Requests for MEDICATION for his LIVER Condition,

Defendant, CFG HEALTH SYSTEMS, LLC., is Responsible for the Negligent Acts or its deliberate indifference or Omissions of its other EMPLOYEES, Who Caused further Harms, Injury, Aggravation to His Pre-existing Medical Condition

WHEREFORE, Calvin Camps, Brings this Cause of Action, against All Defendants to recover Civil Damages in amount of \$ 6,000,000 SIX Million Dollars

1. Plaintiff, Calvin Camps, incorporates by Reference all of The foregoing paragraphs of this Complaint, as a direct result Of Doctor Jane Doe, Nurse Ownes, Johnson, Murphy, Stacy Chase, CFG HEALTH SYSTEMS, LLC, Warden Millie Scholtz, Captain McDONNELLY SERGEANT MS. DAVIS, BOARD OF CHOSEN FREEHOLDERS OF DURLINGTON COUNTY,

2. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS to Calvin Camps, Sustained further, Harms, Denials, Aggravation to his pre-existing Medical condition, Refused to follow Doctors' Orders, Where Complaints are filed on record on all Defendants all of which Are or May be Permanent in Nature.

3. As a Direct result of all Named Defendants herein said Third PARTY Complaint

WHEREFORE, Plaintiff, Calvin Camps, CLAIMS a Sum in excess Of \$ 6,000,000. Six Million Dollars, Brings this Cause of Action As to his Pre-existing Medical condition to recover Civil Damages In excess from Defendants, Who caused Harms, Injury, Punishments, Aggravation to his Pre-existing condition

4. Defendant, Stacy Chase, along with all other named Defendants Up held there ILLEGAL Conduct in which the Plaintiff, Calvin CAMPS, made out Complaints on all Employees, While he was being Caused said Punishments, Denials, Delays, Refusals, Harms, and Aggravation to Pre-existing Medical condition

(d) Pain and Suffering caused where complaints are filed

PUNITIVE DAMAGES

5. Plaintiff, Calvin Camps, incorporates by Reference all of The foregoing paragraphs of this THIRD-PARTY Complaint, By Plaintiff, Calvin Camps, by engaging in acts set forth in The foregoing paragraphs of this COMPLAINT, Defendants named Herein acted under Color of law and at all times had personal Involvement Defendants Intentionally, Willfully and Wantonly, Delayed, Refused, Denied, caused further Injuries, Harms, Caused Unconstitutional Conditions within the Burlington County Detention Center, Inflicted those acts upon PRE-TRIAL DETAINEE, CALVIN CAMPS,

6. All said Defendants should be punished for acts set forth In the foregoing paragraphs of this Third-Party Complaint, So That all Defendants, BURLINGTON COUNTY BOARD OF CHOSEN FREEHOLDER 5, WARDEN MILLIE SCHOLTZ, CAPTAIN McDONNELLY, SERGEANT MS. DAVIS, DOCTOR JANE DOE, NURSE OWNES, NURSE JOHNSON, NURSE MURPHY, STACY CHASE, ADM., CFG HEALTH SYSTEMS, LLC., who may come to be known In said events cited in the foregoing paragraphs of Complaint, Will never again be Tempted to engage in Unconstitutional, CONDUCT

WHEREFORE, Plaintiff, Calvin Camps, CLAIMS a Sum in excess of \$ 3,000,000 Three Million Dollars from all Defendants in PUNITIVE Damages at all times material hereto, Calvin Camps Was under treatment care of the Defendants, Individually, Jointly And/Or Severally, through their agents, servants and Employees, Who were acting within the course and scope of their Agency Or Employment, and under control or right of control of Defendant (s),

(a) Pain and Suffering, between the time of his complaints as To those said Unconstitutional Violations and State law violation s, Under New Jersey laws

(b) Total estimated future earning power loss his estimated Costs of Personal maintenance;

(c) Loss of Retirement and Social Security Income;

(d) Attorney Fees

(e) Court Costs

(f) Reimbursement for Medical Bills and other expenses incurred In connection therewith

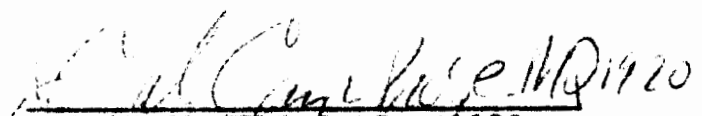
(g) Compensatory damages

(h) Pre-Existing Medical Condition

(i) Copy Costs

(j) Postage Costs

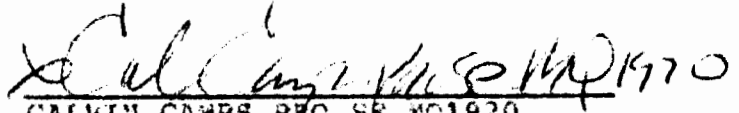
Any other RELIEF this Honorable sees to Grant to the Plaintiff, CALVIN CAMPS as to said VIOLATIONS under Federal and State laws.


CALVIN CAMPS, PRO. SE. AQ1920

I, Calvin Camps, hereby certify that he has served a THIRD-PARTY COMPLAINT ON JOINED PARTY DEFENDANTS, to the Clerk of Court, under Calvin Camps Vs. Warden Millie Scholtz, et.al. 1:17-CV-01895 (JBS-JS) Per the Court Order, By giving it to the Prison OFFICIALS at S.C.I. Chester 500 East 4th Street, Chester Pa 19013, to be Mailed FIRST CLASS MAIL, On the date June 4, 2018 Under the mailbox Rule, The following Parties was served.

SERVED: MICHELLE L. COREA, ESQ. ATTORNEY AT LAW
CAPEHART & SCATCHARD, PA.
ATTORNEYS AT LAW
8000 MIDLANTIC DRIVE, 300 S.
P.O. BOX 5016
MOUNT LAUREL, NEW JERSEY 08054

OFFICE OF CLERK
UNITED STATES DISTRICT COURTHOUSE
P.O. BOX 2797
CAMDEN, NEW JERSEY 08101


CALVIN CAMPS, PRO. SE. MQ1920

I, hereby certify that the foregoing statements made by me are TRUE and Correct, I am aware that if any of the foregoing statements made by me are willfully false, I am subject to PUNISHMENT.

PENNSYLVANIA DEPARTMENT OF CORRECTIONS
SCI-CHESTER
500 EAST 4TH STREET
CHESTER, PA 19013

Name: CALVIN CAMPS, PRO. SE.

Number: MQ1920

6-4-18

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JUN -7 2018

AT 8:30
WILLIAM T. WALSH, CLERK

ATT: CLERK OF COURT
UNITED STATES DISTRICT COURTHOUSE
P.O. BOX 2797
CAMDEN, NEW JERSEY 08101

U.S. POSTAGE PITNEY BOWES

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AT 8:30
WILLIAM T. WALSH, CLERK